

Sent: Tue 1/14/2014 8:08:50 PM
Subject: Discussion on 2014 Draft Permit

Discussion on 2014 Draft Permit

Permit only requires reconstruction of Pond 023
We want a full discharge control structure
Eric says the 2150 mg/L TDS would act as a daily max

Everyone but Gary says the wastewater is process water which means they will have to do the set aside

They need to define "intermittent"

Eric says the monitoring stations should be "within 1.5 miles." Not sure what that means. It seems to mean downstream of ponds which puts it at Piney/Captina confluence.

Issue with section L. States that only two bioassessments will occur but later on in L it talks about sampling frequencies, etc

Gary says the adaptive management section (M) is kind of a meaningless section

Look at WV protocols

We raised last week (I was not present) WET testing. Unclear what the resolution is.

We have a concern that there is an exclusion from having to meet general effluent limits for stormwater. Since the ponds will also hold stormwater then does that mean no general effluent limits? OEPA had agreed and was to remove the exclusion but they didn't.

WET - think about it. If truly intermittent then acute testing. If semi-continuous then probably chronic. But acute sulfate and chronic sulfate toxicity for inverts is about a 2:1 or 1:1 ratio.

Gary wants to get the permit to clearly state that the general limits do apply and that WET testing gets at that narrative in the general limits.

Our points:

- Both ponds need expansion

- Both ponds need dewatering/outfall structures

- Downstream monitoring station needs to be closer to outfalls

 - (Should/must: Must - permit limits that protect water quality)

 - Gary says dewatering must be done for 25 yr rain event

 - Krista says IL restricts discharge to stream stage level

- Discharge conditions need to be defined (if stage upstream of Long Run)

- We think ponds are receiving non-stormwater and OEPA must consider the set-aside

- Adaptive management: doesn't do much and doesn't matter what it says. If there is a problem just fix it within x amount of time

- General limits must be complied with

- WET is required